

EXHIBIT 7

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF DELAWARE;
STATE OF CALIFORNIA; STATE OF
COLORADO; STATE OF ARIZONA; STATE OF
CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAII; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy Beshear,
in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as Governor
of the COMMONWEALTH OF PENNSYLVANIA;
STATE OF RHODE ISLAND; STATE OF
VERMONT; STATE OF WASHINGTON; STATE
OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as AmeriCorps;
and JENNIFER BASTRESS TAHMASEBI, in her
official capacity as Interim Head of the Corporation
for National and Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

DECLARATION OF MARCELLA MILLER

Pursuant to 28 U.S.C. § 1746, I, Marcella Miller, hereby declare as follows:

1. I am a resident of the State of Delaware. I am over the age of 18 and have personal knowledge of all the facts stated herein, including as based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set

forth below. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the State of Delaware, Department of Health and Social Service, as a Social Services Administrator, Program Director of AmeriCorps Delaware.

3. I served as an AmeriCorps National Civilian Community Corps (NCCC) member from February 2015 through November 2015.

4. The AmeriCorps National Civilian Community Corps (NCCC) was established on October 1, 1993, as a federal program to engage young adults in team-based community service projects across the United States.

5. As of 2024, AmeriCorps NCCC deployed approximately 2,200 members annually, aged 18 to 26, who serve full-time on teams of about 10 individuals. These teams participate in a series of 6- to 12-week projects during their 10-month term, addressing various community needs such as disaster response, infrastructure improvement, environmental conservation, and urban and rural development

6. Upon successful completion of the AmeriCorps NCCC service term, members are eligible to receive the Segal Education Award. The award can be used towards current educational expenses, trade programs, and to repay qualified student loans.

7. During my service term with AmeriCorps NCCC, I served diverse communities across the southern region of the United States including; Vicksburg Mississippi; Macon Georgia; Halifax, North Carolina; Columbia, South Carolina; and Foley, Alabama. My service included academic support and mentorship to 210 elementary school students, assisting in capacity building and canvassing efforts for a youth camp, contributing to environmental conservation by clearing

seven acres of invasive plant species in a state park, and delivering immediate disaster response and relief services.

8. The contributions of the NCCC team were essential; without them, the non-profits and government organizations we assisted would not have been able to achieve the same level of impact

9. After completing my service, I utilized my education award to help pay off student loans I accrued while earning my bachelor's degree in social work. The approximately \$6,000 I received significantly reduced my student debt. In addition, I applied the training, professional experience, and skills gained during my term of service to shape and advance my career path.

10. Continuing my career in Delaware, I now serve in a role that leverages my AmeriCorps experience through direct oversight of AmeriCorps State and Competitive grants, along with the management of AmeriCorps program operations.

11. As of April 17, 2025, I learned from the America's Service Commissions that 85% percent of AmeriCorps staff were placed on administrative leave, leaving only a small number of employees left in each department. On April 24, I understand that a large number of the AmeriCorps employees who had been placed on administrative leave received Reduction-In-Force notices and that they would be terminated as of June 2025.

12. The affected staff include portfolio managers and regional personnel who provided training, oversight, and technical assistance to the Delaware Commission staff responsible for managing AmeriCorps federal grant funding. The federal staff played an integral role in grant management, performance oversight, and financial administration.

13. The loss of AmeriCorps staff also will lead to delays in the agency's review of competitive grant applications, formula grant applications, and the Commission Support Grant,

and Commission Investment funds. The impact to the grant making and award process will be devastating.

14. Programs that receive AmeriCorps funding may be forced to shut down without continued support, as they rely heavily on the additional resources provided by the program. The loss of AmeriCorps members and staff would severely diminish organizational capacity, resulting in significant community impacts. Without this support, the reach and effectiveness of services in our communities would be drastically reduced.

15. Without the opportunity to serve through AmeriCorps, many individuals who relocate to Delaware for national service may never establish roots in the state. As a result, Delaware loses a valuable pipeline of skilled, service-minded individuals who often transition into long-term residents and contributors to the local workforce. The absence of AmeriCorps significantly weakens workforce development efforts by removing an important entry point into public service, nonprofit careers, and other critical sectors.

16. Late in the evening on Friday, April 25, 2025, I received a letter from Acting Agency Head Jennifer Bastress Tahmasebi, a copy of which is attached as Exhibit 1, and which notified AmeriCorps Delaware that the federal grants for nine of AmeriCorps Delaware's ten subgrantees had been terminated: Children's Beach House, West End Neighborhood House, Leading Youth Through Empowerment, Literacy Delaware, Reading Assist Institute, TeenSHARP, Family Promise, Spur Impact, and We Prosper Family Organization. Each of these nine subgrantees had received a formula grant, rather than a competitive grant.

17. Specifically, the notice stated, in part: "Effective immediately, the AmeriCorps award subrecipient(s) included in the attached spreadsheet is/are being terminated per 2 CFR 200.340(a)(4) because it has been determined that the award no longer effectuates agency

priorities. You must immediately cease all award activities. This is a final agency action and is not administratively appealable.”

18. In addition to terminating the grants for these programs, which in the aggregate total \$1,232,901, the notice directed AmeriCorps Delaware that:

State commissions and prime grantees should immediately notify subgrantees, operating sites, and members and follow grant close-out procedures. All member activities should cease immediately. Members should be exited for compelling personal circumstances (CPC). The program should document that the member was exited for compelling personal circumstances due to the agency’s termination of the grant and program closure. If possible, the program should try to have the member transferred to another program. If this is not possible, the program should note in the CPC documentation that member reassignment was not an option.

19. Because AmeriCorps has cancelled programs for nine of the ten subgrantees that AmeriCorps Delaware funds, it will not be possible to transfer more than a few affected members from the cancelled programs to the SummerCollab program, which is the only Delaware AmeriCorps subgrantee program that AmeriCorps did not terminate. Currently, 64 active members are serving under the nine subgrantees affected by AmeriCorps grant terminations; 17 VISTA members also served in Delaware before these terminations.

20. AmeriCorps Delaware does not have the financial resources to compensate for the cancellation of nearly \$1.233 million in funding. Operating under the State Office of Volunteerism—a division of the Delaware Department of Health and Social Services—it already faces constraints due to limited state funding. The loss of this substantial financial support places immense pressure on our ability to sustain essential programs and services.

21. Without this funding, AmeriCorps Delaware will be unable to provide subgrantees with the necessary volunteers to continue full operations. The recruitment, training, and deployment of volunteers—especially those serving vulnerable populations—require extensive resources, including background checks, onboarding procedures, and ongoing support. The

absence of these resources would dramatically reduce the capacity of many nonprofit and community-based organizations, jeopardizing critical programs that directly serve individuals in need. Some of these organizations, which rely heavily on AmeriCorps grants to fulfill their missions, may face the devastating reality of scaling back operations or even shutting down altogether.

22. The termination of AmeriCorps programs in Delaware presents an urgent challenge, leaving vulnerable populations without the critical services they depend on. Among the affected organizations, Children's Beach House stands out, with over 50% of its service population consisting of children with Individualized Education Plans (IEPs), including those in foster care. While these children receive prescribed speech and language therapy through their schools, a significant gap remains in addressing the social challenges that often accompany communicative disabilities. Children's Beach House fills this gap by helping children understand their strengths, challenges, and emotions, empowering them to navigate the world as thriving, contributing members of society. Exhibit 2.

23. AmeriCorps members are essential to Children's Beach House, providing foundational support for its residential camp programs and acting as the backbone of its afterschool and day camp services. As a nonprofit, Children's Beach House relies on AmeriCorps grants to maintain the state-mandated adult-to-child ratio in its afterschool program, ensuring a safe and structured environment for youth. Without AmeriCorps, the afterschool program faces severe reductions or even elimination, leaving children with IEPs without a designated space to catch up on schoolwork missed due to therapy sessions, without access to tutoring tailored to slower processing speeds, and without programs designed to strengthen their social-emotional skills. Exhibit 2

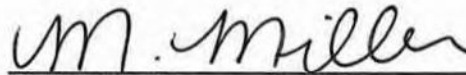
24. The loss of these essential supports carries profound consequences. Research indicates that without interventions like those provided by Children's Beach House, children with IEPs are at higher risk of diminished academic performance, increased disciplinary challenges stemming from difficulty expressing their needs, and heightened mental health struggles due to social isolation and marginalization. Replacing AmeriCorps would not simply be difficult—it would be devastating for the children and families who rely on these services and who have developed working relationships with the AmeriCorps members placed at Children's Beach House. The immediate disruption to programs like Children's Beach House underscores the irreplaceable role AmeriCorps plays in ensuring equitable opportunities for Delaware's most vulnerable youth. Exhibit 2

25. Additionally, the termination of these grants will significantly impact recruitment efforts moving forward. AmeriCorps members receive a modest living allowance and an education award—two benefits that play a crucial role in attracting individuals who might not otherwise be able to volunteer due to financial constraints. The elimination of these incentives will severely limit organizations' ability to recruit qualified individuals, forcing them to rely solely on unpaid volunteers. This shift is not sustainable, as many organizations may need to create new paid positions to fulfill the responsibilities previously handled by AmeriCorps members, but at a much higher cost. Given that most of these organizations operate as nonprofits or state-funded entities, the financial burden of staffing these roles could prove insurmountable.

26. AmeriCorps Delaware does not have alternative funding sources or a reserve that would allow it to compensate for the loss of these grants. Nor is it equipped to provide subgrantees with volunteers outside of the AmeriCorps program. The termination of these grants will create immediate and long-term challenges for recruitment, placing numerous programs and services at

risk. If alternative solutions are not identified, Delaware's nonprofit and community service sector will suffer significant setbacks, ultimately limiting the ability to serve those who rely on these vital programs the most.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on May 5, 2025, at New Castle, Delaware.

A handwritten signature in black ink, appearing to read "M. Miller", is written over a horizontal line.

Marcella Miller
Social Services Administrator, Program Director
Delaware DHSS/ Division of Social Services

EXHIBIT 1

Marcella Miller

Health and Social Services, Department of

1901 N Dupont Hwy

Fl 1

New Castle

DE, 19720

RE: Grant Termination

Dear AmeriCorps Award Recipient:

Effective immediately, the AmeriCorps award subrecipient(s) included in the attached spreadsheet is/are being terminated per 2 CFR 200.340(a)(4) because it has been determined that the award no longer effectuates agency priorities. You must immediately cease all award activities. This is a final agency action and is not administratively appealable.

The provisions at [2 CFR 200.343 – Effects of Suspension and Termination](#) apply. This process ensures the equitable settlement of costs, proper disposition of government property, and mitigation of negative impacts on stakeholders. AmeriCorps staff will initiate an amendment to change the end date of the period of performance effective immediately.

Please immediately notify subrecipients and/or community partners, if applicable, and initiate your internal termination and closeout procedures.

Please review [Closeout Instructions for Grantees](#) to close out this Federal award within 120 days. Please note, there are some close-out actions that indicate that you must submit information to your portfolio manager. Instead of submitting to those individuals, you must instead submit to the following regional mailboxes:

- MidAtlantic@americorps.gov (DC, DE, MD, NJ, PA, PR, VA, VI, WV)
- Midwest@americorps.gov (IL, IN, KY, MI, OH)
- Mountain@americorps.gov (AZ, CO, ID, MT, NM, UT, WY)
- NorthCentral@americorps.gov (IA, MN, WI, ND, SD, NE, KS, MO)
- Northeast@americorps.gov (CT, MA, ME, NH, NY, RI, VT)
- SouthCentral@americorps.gov (AR, LA, MS, OK, TX)
- Southeast@americorps.gov (AL, FL, GA, NC, SC, TN)
- West@americorps.gov (AK, AS, CA, CNMI, GU, HI, NV, OR, WA)

Costs after termination are allowable if:

- (a) The costs result from financial obligations which were properly incurred before the effective date of termination, and
- (b) costs are for necessary and reasonable termination and closeout activities.

Please follow the program specific instructions below, based on the type of award that is being terminated.

AmeriCorps State and National

State commissions and prime grantees should immediately notify subgrantees, operating sites, and members and follow grant close-out procedures. All member activities should cease immediately. Members should be exited for compelling personal circumstances (CPC). The program should document that the member was exited for compelling personal circumstances due to the agency's termination of the grant and program closure. If possible, the program should try to have the member transferred to another program. If this is not possible, the program should note in the CPC documentation that member reassignment was not an option.

Jennifer Bastress Tahmasebi

Interim Agency Head

Grant Number	Application ID	Organization	Corporate Program Code	Project	Organization State	Federal Funding
23AFBDE0010003	24AC266343	Spur Impact Association	STATE	Spur Impact Association	DE	\$40,720
23AFBDE0010005	24AC274793	Leading Youth Through Empowerment Inc	STATE	Leading Youth Through Empowerment Americorps	DE	\$130,941
23AFBDE0010004	24AC266377	Family Promise of Northern New Castle County, Inc.	STATE	Family Promise of Northern New Castle County, Inc.	DE	\$40,721
23FXBDE0010007	24ES266465	TEENSHARP A NJ NONPROFIT CORP	EAS	Teen SHARP	DE	\$49,140
23FXBDE0010008	24ES273229	We Prosper Family Organization Inc	EAS	We Prosper	DE	\$132,300
23FXBDE0010005	24ES266393	LITERACY DELAWARE, INC.	EAS	Literacy Volunteers Serving Adults northern Delaware, Inc II	DE	\$129,330
23FXBDE0010002	24ES273235	WEST END NEIGHBORHOOD HOUSE INC	EAS	West End Neighborhood House AmeriCorps	DE	\$120,879
23FXBDE0010004	24ES274729	Children's Beach House, Inc.	EAS	Children's Beach House, Inc. III	DE	\$283,500
23FXBDE0010001	24ES274972	Reading ASSIST Institute	EAS	Reading Assist - Project Accelerate	DE	\$305,370

EXHIBIT 2



Statement on Impact of AmeriCorps Grant Termination

Children's Beach House serves under-resourced children with communicative disabilities across the state of Delaware. Because of their lack of resources and their disabilities, these children are often at the margins of their social circles in their schools and their neighborhoods. Since 1936, Children's Beach House has been a second home for these vulnerable kids, a safe place where they can escape the pressures of poverty and build positive, life-long friendships with their peers. Research proves that these relationships form one of the most effective protective factors to keep kids from risk. Through residential summer and weekend camps, afterschool programming and summer day camps, and family wrap-around services, Children's Beach House takes a holistic approach to ensure that children who struggle to find their voice are not left unheard.

Over 50 percent of our service population is comprised of children with Individualized Education Plans, including children in foster care. While these kids likely receive prescribed speech and language therapy through their schools, there is little to no support around the social deficits that come with communicative disabilities. Children's Beach House stands in that gap, helping children understand their strengths, challenges, and emotions so they can find their way in the world as thriving, contributing members of society.

AmeriCorps members support Children's Beach House residential camp programs and are the backbone of its afterschool and day camp services. As a nonprofit, Children's Beach House has planned for and depends on AmeriCorps grants to run the afterschool program within the state-mandated ratio of adults to children and to create the safety and sense of belonging for our youth. **Without AmeriCorps, the afterschool program will be drastically curtailed or eliminated entirely. That means children with IEPs will have no safe place to catch up on schoolwork they missed due to prescribed therapy, no tutoring to compensate for slower processing speeds, and no exposure to programming designed to strengthen their social-emotional skills.** Without these supports, studies have shown bleak results: poor academic performance, frequent disciplinary interventions stemming from an inability to communicate their needs, and increased mental health concerns associated with social isolation and marginalization.

On behalf of the vulnerable children of Delaware, we implore the White House to rescind its order effectuating the immediate termination of AmeriCorps grant funding. Our kids face enough instability already. This chaotic disruption will undercut their progress toward becoming successful, productive adults.